

THE ROSEN LAW FIRM, P.A.

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Lead Counsel for Lead Plaintiff and the proposed Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MARK ALLEN and SALVATORE RAPPA,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

PIXARBIO CORPORATION f/k/a BMP
HOLDINGS INC., FRANCIS M. REYNOLDS,
KENNETH A. STROMSLAND, KATRIN
HOLZHAUS, DAVID A. CASS, DEREK S.
BRIDGES, and LAURA BARKER MORSE,

Defendants.

MICHAEL SCHNIEDERS, derivatively on behalf
of PIXARBIO CORPORATION,

Plaintiff,

v.

FRANCIS M. REYNOLDS, KATRIN
HOLZHAUS, DAVID A. CASS, and LAURA
BARKER MORSE,

Defendants,

and

PIXARBIO CORPORATION,

Nominal Defendant.

Case No. 2:17-cv-00496-CCC-SCM

CLASS ACTION

**NOTICE OF MOTION AND MOTION
FOR FINAL APPROVAL OF
SETTLEMENT AND PLAN OF
ALLOCATION**

Motion Day: March 13, 2020

Hon. Claire C. Cecchi

Case No. 2:17-cv-02987

PLEASE TAKE NOTICE that pursuant to the Court's Order Granting Motion for Preliminary Approval of Class Action and Derivative Action Settlement dated November 18, 2019 (Dkt. No. 135), on March 13, 2020, at 12:30 p.m., or as soon thereafter as counsel may be heard, at 50 Walnut Street, Courtroom MLK 5B, Newark, New Jersey 07102, before the Honorable Claire C. Cecchi, United States District Judge, Lead Plaintiffs Mark Allen and Salvatore Rappa, Named Plaintiffs Marvin Becker and Jacqueline Becker ("Class Plaintiffs"), and Michael Schnieders ("Derivative Plaintiff," and collectively, "Plaintiffs"), through their undersigned Counsel, will move for final approval of the class action Settlement and Plan of Allocation of Settlement proceeds.

Plaintiffs' motion is based on: (i) the Memorandum of Law in Support; (ii) the Declaration of Laurence M. Rosen in Support of Motions for: (1) Final Approval of Proposed Settlement; and (2) Award of Attorneys' Fees, Reimbursement of Expenses, and Awards to Lead Plaintiffs, Named Plaintiffs, and Derivative Plaintiff and the exhibits thereto; (iii) the Stipulation and Agreement of Settlement filed September 4, 2019 and the exhibits thereto (Dkt. No. 132); and (iv) all other pleadings and matters of record and such additional evidence or arguments as may be presented at the hearing.

Dated: February 14, 2020

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Laurence M. Rosen

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Settlement Class*

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Counsel for Derivative Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this on February 14, 2020, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence M. Rosen